IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

LUIS ANGEL ALVAREZ ROMAN, :

CIVIL ACTION NO. 1:23-cv-02348

Plaintiff, :

JUDGE PATRICIA A. GAUGHAN

v.

.

CITY OF LORAIN, OHIO, ET AL.,

:

Defendants.

JOINT MOTION BY PLAINTIFF AND COUNTY DEFENDANTS TO EXTEND THE DEADLINE FOR PLAINTIFF'S DISMISSAL AGAINST COUNTY DEFENDANTS

The undersigned counsel for the parties hereby jointly and respectfully request that this Court extend the deadline for filing Plaintiff's dismissal against the County Defendants. Due to an unanticipated delay, and despite diligent efforts, the County Defendants require additional time to issue the settlement payment in this matter. As such, the Parties jointly request a one-week extension (until February 7, 2025) for Plaintiff's filing of the dismissal against the County Defendants to allow payment to be issued ahead of the same.

Respectfully submitted:

By: /s/ David M. Smith
DAVID M. SMITH (0079400)
NICHOLAS J. HANEK (0083578)
Meyers, Roman, Friedberg & Lewis
28601 Chagrin Blvd., Ste. 600
Cleveland, Ohio 44122
(216) 831-0042
(216) 831-0542 – Fax
dsmith@meyersroman.com
nhanek@meyersroman.com

Madeline J. Rettig (0098816)
(mrettig@marshallforman.com)
John S. Marshall (0015160)
(jmarshall@marshallforman.com)
Edward R. Forman (0076651)
(eforman@marshallforman.com)
Samuel M. Schlein (0092194)
(sschlein@marshallforman.com)
Helen M. Robinson (0097070)
(hrobinson@marshallforman.com)

By: /s/ Madeline J. Rettig_

Counsel for Lorain County Defendants

MARSHALL FORMAN & SCHLEIN LLC

250 Civic Center Dr., Suite 480 Columbus, Ohio 43215-5296

(614) 463-9790 Fax (614) 463-9780

Counsel for Plaintiff